APPENDIX A

PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received label, affix it in the space at left. information on the label is incorre through it and supply the correc in the appropriate section below. complete and correct, leave items below blank. If you did not receiv label, complete all items. "Installat single site where hazardous waste treated, stored and/or disposed of porter's principal place of business. to the INSTRUCTIONS FOR FILI CATION before completing this information requested herein is req *(Section 3010 of the Resource Cons Recovery Act).*

INSTALLATION'S EPA I.D. NO.	PAD004397030
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	WATSON-STANDARD COMPANY* PO BOX 11250 PITTSBURGH, PA 15238
III. LOCATION OF INSTALLATION	HITE RD ~~PITTSBURGH, PA 15238~~ H ARWICK, PA 15049

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F PAD004397030 T/A C 1		80 08 11

Aug 11 80 00 00 40

I. NAME OF INSTALLATION

WATSON STANDARD COMPANY*

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 P O BOX 11250

CITY OR TOWN	ST.	ZIP CODE
4 PITTSBURGH	PA	~~15238~~

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 HITE ROAD

CITY OR TOWN	ST.	ZIP CODE
6 HARWICK	PA	15049

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 NEUWIRTH EDWARD VICE PRESIDENT	412-362-8300

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 WATSON STANDARD COMPANY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notif
If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D: PAD004397

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. – FOR OFFICIAL USE

1	2												
W	P	A	D	0	0	4	3	9	7				

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed h waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardou specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K078	K079				
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chem stance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, v hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–list hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this a attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the inform I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties fo mitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Edward H Neuwirth	Edward H. Neuwirth Vice President	8-6-8

EPA

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F P A D 0 0 4 3 9

PAD004397030

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

WATSON STANDARD COMPANY
P.O. Box 11250
Pittsburgh, PA 15238

VI. FACILITY LOCATION

Hite Road
Harwick, PA 15049

GENERAL INSTR

If a preprinted label has b
it in the designated space
ation carefully; if any of t
through it and enter the
appropriate fill-in area bel
the preprinted data is abse
left of the label space lis
that should appear), please
proper fill-in area(s) belo
complete and correct; you
items I, III, V, and VI (a
must be completed regard
items if no label has been
the instructions for detail
tions and for the legal au
which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the answer is "no". If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of terms.

SPECIFIC QUESTIONS	MARK "X" YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)
C. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X		D. Is this facility (either existing or proposed) a facility which results in a discharge to waters of the U.S.? (FORM 2C)
E. Does or will this facility (either existing or proposed) inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)

III. NAME OF FACILITY

1 WATSON STANDARD COMPANY

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 NEUWIRTH, EDWARD, VICE PRESIDENT	4 1 2 3 6 2 8 3 0 0

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 P.O. BOX 11250

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 PITTSBURGH	PA	15238

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 HITE ROAD

B. COUNTY NAME

ALLEGHENY

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 HARWICK	PA	15049	

A. FIRST: 2851 (specify) Paint Products and Industrial Coatings

B. SECOND: (specify) (Red)

C. THIRD: (specify)

D. FOURTH: (specify)

VIII. OPERATOR INFORMATION

A. NAME: WATSON STANDARD COMPANY

B. Is the name listed in Item VII as owner? [X] YES

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL S = STATE P = PRIVATE M = PUBLIC (other than federal or state) O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 412 362 83

E. STREET OR P.O. BOX: LITE ROAD

F. CITY OR TOWN: HARWICK

G. STATE: PA

H. ZIP CODE: 15049

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N

D. PSD (Air Emissions from Proposed Sources): 9 P

B. UIC (Underground Injection of Fluids): U

E. OTHER (specify): 9 (specify)

C. RCRA (Hazardous Wastes): R

E. OTHER (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must sho the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous was treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surfa water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Paint products and industrial coatings are manufactured at this site. Paint products are sent to paint dealers and stores for resale; the industrial coatings are sold to the metal coating industry in 5 gallon and 55 gallon containers.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and a attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in th application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submittin false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Edward H. Neuwirth, Vice President	Edward H. Neuwirth	11-12-80

COMMENTS FOR OFFICIAL USE ONLY

RCRA

EPA

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F P A D 0 0 4 3 9

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting fo revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, en EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complet*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	6 8	1	

FOR N PROV (yr., m TION EXPEC

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines a entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of co describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes t measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE MEASURE FOR DESIGN CAP
Treatment:		
TANK	T01	GALLONS PER D LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER D LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR METRIC TONS PE GALLONS PER H LITERS PER HOU
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DA LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	
HECTARE-METER	
ACRES	
HECTARES	

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallo other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S		T/A	C
C	DUP		1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1 *	S 0 1	75X 55 = 4125	G	
2				
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)
5			
6			
7			
8			
9			
10			

...SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTER INCLUDE DESIGN CAPACITY.

ORIGINAL (Red)

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will ha handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the tics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled or basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the a codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure t account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained i to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminent entered in column A, select the code*(s)* from the list of proc contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes tha that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three es described above; (2) Enter "00 extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be desc more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Weste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the tot quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that l "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Tw are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an e 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

CONTINUE O

...copy this page before completing if yo[u ha]ve more than 26 wastes to list. Form Approved OMB No. 158-S

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W P A D 0 0 4 3 9 7 0 3 0 — T/A C: 1	W DUP — T/A C: 2 — DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES: 1. PROCESS CODES (enter)	D. PROCESSES: 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D001 ~~K078~~	~~36600~~ 366,000	P ~~G~~	S01	TEMPORARILY SUSPENDED 1/16/81
2	D001 ~~K079~~	~~2150~~ "	P ~~G~~	S01	
3					
4					
5					~~K078, K079 CHANGED TO~~ D001 27AUG1981. PG
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

ORIGINAL
(Red)

EPA I.D. NO. *(enter from page 1)*

													T/A	C
F	P	A	D	0	0	4	3	9	7	0	3	0		6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storag treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
40 33 18	79 48 37.5

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the le skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area co*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP COD
F	G		

IX. OWNER CERTIFICATION

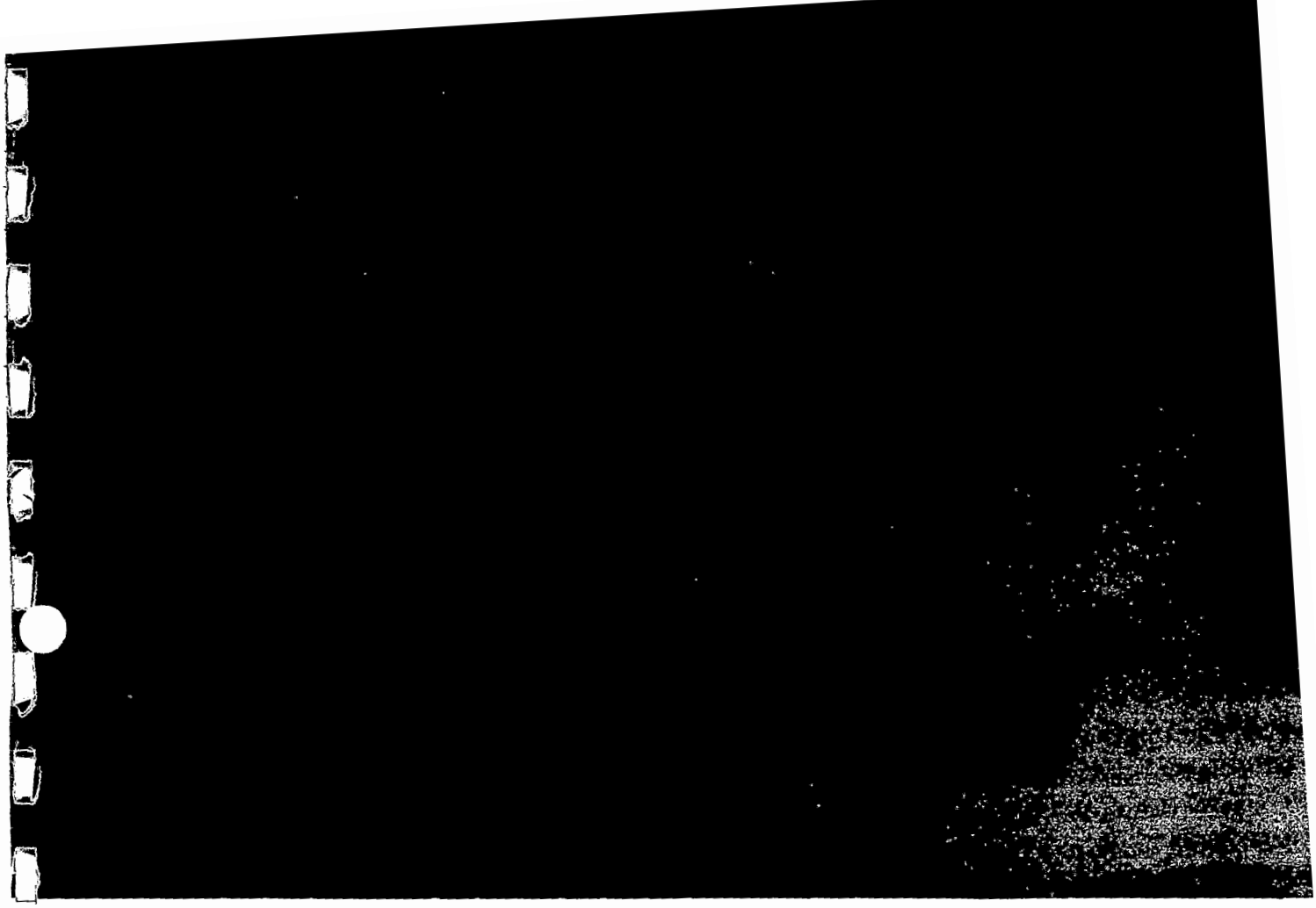
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attache documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that t submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false informatio including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Edward H. Neuwirth, Vice President	Edward H. Neuwirth	1-26-81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attache documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that t submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false informatio including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Edward H. Neuwirth, Vice President	Edward H. Neuwirth	11-12-80



EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ *PAD004397030

WATSON-STANDARD COMPANY
PO BOX 11250
PITTSBURGH PA 15238

INSTALLATION ADDRESS ➤ RITE RD
HARWICK PA 15049

EPA Form 8700-12B (4-80)

10/09/80

ORIGIN. (Red)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JAN 2 0 1981

Certified Mail
Return Receipt Requested

Mr. Edward Neuwirth
Watson Standard Company
P.O. Box 11250
Pittsburgh, PA 15238

Re: Hazardous Waste Permit Application - Missing Information
EPA I.D. Number: PAD004397030
Facility Name: Watson Standard Company
Facility Location: Hite Road
Harwick, PA 15049

Dear Mr. Neuwirth:

The Environmental Protection Agency (EPA) has received an application for a Federal hazardous waste permit for the facility referenced above. The Agency has reviewed the application and found that the information items marked below are missing. These items must be completed and the application returned to this office by Feb. 19, 1981 in order for the Agency to determine whether the owner or operator of the facility qualifies for interim status.

Because we received a large number of permit applications, we were able to conduct only a preliminary review of this application and will conduct a more detailed review at a later date. If we find that additional items are missing, we will contact you again at that time.

THE FOLLOWING MISSING ITEMS MUST BE COMPLETED.

/ / Form 1 Item XIIIR Signature

/ / Form 3 Item IIA1 Date Operation Began or Construction Commenced

/X/ Form 3 Item IXB Owner's Signature

If you have any questions, please contact Joan Henry on 215-597-8751 or Bill Walsh on 215-597-1230.

Sincerely yours,

Shirley D Bulkin

Shirley D. Bulkin
Chief, RCRA Administrative Support Section
Permits Enforcemnt Branch
Enforcement Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS

PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # [illegible] 00 429 703[illegible]

February 4, 19[illegible]

Mr. [illegible] Neuwirth
[illegible] Company
P.O. Box 11250
Pittsburgh, PA 15238

Re: Acknowledgment of Application for a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

(Re

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

July 9, 1981

Mr. Edward Neuwirth, Vice President
Watson Standard Company
P. O. Box 11250
Pittsburgh, PA 15238

RE: Paint Wastes -- EPA I.D. No. PAD 00 439 7030

Dear Mr. Neuwirth:

EPA has completed its initial review of your application to treat/store/dispc of hazardous waste under the Resource Conservation and Recovery Act ("RCRA"). The wastes listed as being handled by your facility have been temporarily sus pended from regulation as a listed hazardous waste. An amendment to 40 CFR Part 261.32, Hazardous Waste from Specific Sources, was published in the Fede Register on January 16, 1981. This amendment temporarily suspended the listi of all wastes from the manufacture of paints (EPA Hazardous Waste Nos. F017, F018, K078, K079, K081, K082) until further study on those wastes has been cor ducted. However, wastes which exhibit any of the hazardous waste characteris- tics (i.e. reactivity, ignitability, corrosivity, and EP toxicity) as defined in 40 CFR Part 261 remain subject to regulation under RCRA.

In order for EPA to return your permit application, EPA requests that you make a determination as to whether or not the waste streams listed on your application are hazardous by one or more of the general characteristics. Ignitability and EP toxicity would be the characteristics which would most likely cause paint manufacturing wastes and residues to be defined as a hazardous waste. Your determination would best be supported by attaching a copy of a laboratory analysis although one is not necessarily required. In order to properly process your permit application and avoid further inquiries, a prompt response would be beneficial to yourself and EPA.

If you have any questions, please do not hesitate to contact Bill Walsh at (215) 597-1230.

All replies should be addressed to:

U.S. Environmental Protection Agency
Permits Enforcement Branch
6th and Walnut Streets
Philadelphia, PA 19106
Attn: Ms. Shirley D. Bulkin

Sincerely yours,

Shirley D. Bulkin
RCRA Administrative Support Section
Permits Enforcement Branch

...CATION

☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Mr. Edward Neuwirth
Heckerman? Standard ? Co.
(412) 262-8300

FROM: [illegible]

DATE 5/24/81

TIME

SUBJECT

Response to Suspended Waste Code Letter

SUMMARY OF COMMUNICATION

5/24/81

[illegible] Mr. Neuwirth was at a meeting. He will return my call

5/25/81

10:30 A Mr. Neuwirth said that he responded to the letter, ~~because~~ he asked for another copy of the suspended waste code letter to which he said he would again reply

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES
TO:

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 5300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

ORIGIN.
(Red)

Watson-Standard Co.

August 27, 1981

Ms. Shirley D. Bulkin
U.S. ENVIRONMENTAL PROTECTION AGENCY
Permits Enforcement Branch
6th & Walnut Street
Philadelphia, PA 19106

Dear Ms. Bulkin:

We acknowledge your July 9, 1981 in reference to - Paint Wastes - EPA I.D. No PAD 00 439 7030.

The wastes generated at this facility which are listed under K078 exhibit the characteristic of ignitability as defined in 40 CFR Part 261.

Yours very truly,

WATSON-STANDARD COMPANY

E. H. Neuwirth

Edward H. Neuwirth
Executive Vice President

ce

RECORD OF COMMUNICATION

☑ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ OTHER (SPECIFY)

(Record of item checked above)

TO: EDWIN NEUWIRTH
WATSON STANDARD ~~PAINT~~ CO.

FROM: P.J. GOTTHOLD
EPA REGION III
RCRA

DATE SEPT

TIME 9:30

SUBJECT

PAINT WASTE / DRUM STORAGE CLARIFICATION

SUMMARY OF COMMUNICATION

MR. NEUWIRTH TOLD ME THAT THE DRUM STORAGE WOULD NOT EXCEED 55 GAL X 75 DRUMS = 4125 GALS.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

INFORMATION COPIES
TO:

EPA Form 1320-6 (7-72) REPLACES EPA HQ FORM 5330-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

ORIGIN (Red)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

September 10, 1981

Mr. Edward H. Neuwirth
Watson Standard Company
P. O. Box 11250
Pittsburgh, PA 15238

Dear Mr. Neuwirth:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

OPERATION DURING
INTERIM STATUS

ORIGI
(Re

Date Prepared: September 10, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Watson Standard Company

Location: Hite Road
Harwick, PA 15049

EPA I.D. No.: PAD 00 439 7030

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Watson Standard Company
Edward H. Neuwirth, Vice President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS	DESIGN CAPACITY
S01	4,125 Gals.

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

D001				

ORIGI
(Req

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D Bulkin

Shirley D. Bulkin
Chief, Administrative Support Section
Permit Enforcement Branch

Enclosure

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT
1204 Kossman Building
100 Forbes Avenue
Pittsburgh, Pennsylvania 15222-1376 (412) 565-5018

November 27, 1981

NOTICE OF VIOLATION

CERTIFIED MAIL #3876740

Watson Standard Company
P.O. Box 11250
Pittsburgh, PA 15238

Attention: Henry Lynch
Purchasing Agent

RE: Watson Standard Company
Springdale Township
Allegheny County
PAD004397030

Dear Mr. Lynch:

An inspection of your facility was conducted on November 23, 1981 pursuant to the Pennsylvania Solid Waste Management Act of 1980, Act 97, and the Rules and Regulations promulgated thereunder. The rules and provisions of this Act are being enforced by the Pennsylvania Department of Environmental Resources which has been granted interim authorization over hazardous waste activities by the U.S. Environmental Protection Agency. As a result of this inspection, this Department observed the following violations of the "Minimum Standards for a Hazardous Waste Management Facility" as set forth in 25 Pa. Code, Section 75.262 (Generator) and Section 75.265 (TSDF):

Generator violations:

1. Section 75.262(m)(5) - No Preparedness, Prevention or Contingency Plan.

TSDF violations:

2. Section 75.265(d) - No warning signs posted.

3. Section 75.265(e) - No inspection schedule.

4. Section 75.265(f) - No training program.

5. Section 75.265(f)(6) - No records of employee training.

6. Section 75.265(h) - No spill control equipment.

7. Section 75.265(i)(1-11) - No Contingency Plan on site which should include:

   (a) Action personnel will take during an emergency, spill and/or explosion.

   (b) What arrangements have been made with outside emergency response teams (police, fire department and private companies).

   (c) List of emergency coordinators.

8. Section 75.265(k) - No written operating record.

9. Section 75.265(o) & (p) - No Closure Plan and closure cost estimate.

10. Section 75.265(q) - Maintain a written record of weekly inspections.

All of the above cited violations should be corrected within thirty (30) days from receipt of this letter.

Enclosed are copies of the inspections.

If you have any questions, please feel free to contact this office at 565-5018.

Sincerely,

James R. Shack
Solid Waste Specialist
Bureau of Solid Waste Management

JRS/ksw

Enclosures (2)

cc: Regional File
Central File
Chron
J. Shack

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT
851 Kossman Building
100 Forbes Avenue
Pittsburgh, Pennsylvania 15222-1376 (412) 565-5023

February 18, 1983

CERTIFIED MAIL #440138

Edward Neuwirth
P.O. Box 11250
Pittsburgh, PA 15238

RE: Watson Standard Company
ID No. PAD004397030
Neville Township
Allegheny County

Gentlemen:

This letter constitutes a formal request for Part B of your application for a Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 PA Code Chapter 75, Subchapter D, for the facility referenced above. This request is made under the authority of Section 75.265 (z) (6) of the regulations. You should refer to the hazardous waste management regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you for the requirements of the Part B application. Your Part B application must be submitted no later than six months from the date of this notice. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

Enclosed are reference checklists for your Part B application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Your Part B application will be reviewed for a hazardous waste management TSD Permit by both the U.S. Environmental Protection Agency and the Department of Environmental Resources until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

You should submit the Part B application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

When completed please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact us.

Sincerely,

Charles A. Duritsa
Regional Solid Waste Manager

CAD/DV/kw

Enclosure

cc: U.S. EPA - Region III ✓
Regional File
Central Office
County Office
Chron

Watson-Standard Co.

ORIGIN
(Red,

DER-EP

1983 SEP 28 AM 11:

SOUTHWESTERN REGIO

September 27, 1983

Mr. Dan Peterson
Dept. of Enviromental Resources
Solid Waste Management
851 Kossman Building
Pittsburgh, Pa., 15222

RECEIVED
OCT 11 1983
DIV. OF HAZARDOUS WASTE

Re: PAD 004397030

Dear Mr. Peterson:

Following up our phone conversation enclosed is copy of form ER SWM 53.

At one time Watson Standard Company had considered becomming a hazardous waste storage facility, but after careful consideration we here=by with draw our applic tion, and will remain as a generator only under our instalation E P A I. D. number.

If you have any further questions please feel free to call the writer any time.

Very Truly Yours,

WATSON STANDARD COMPANY

Henry E. Lynch

Henry E. Lynch
Secretary

1 Encl.

(Red)

BUREAU OF SOLID WASTE MANAGEMENT

EPA Form 3510-3: Rev. 3/82

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I. INSTALLATION'S EPA I.D. NUMBER

P A D 0 0 4 3 9 7 6 3 0

II. NAME OF INSTALLATION

WATSON STANDARD COMPANY

III. INSTALLATION MAILING ADDRESS

STREET OR P. O. BOX: P.O. BOX 11250

CITY OR TOWN: PITTSBURGH | ST.: PA | ZIP COD: 15238

IV. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: HITE ROAD | MUNICIPALITY: HARWICK

CITY OR TOWN: HARWICK | ST.: PA | ZIP CODE: 15049 | COUNTY: ALLEGHENY

V. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title): HENRY T. LYNCH SECRETARY | PHONE NO. (area co): 4 1 2 3 6 2 8

VI. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

CORPORATION

B. TYPE OF OWNERSHIP

(enter the appropriate letter into box) F = FEDERAL M = NON-FEDERAL: M

OCT 1 1983

VII. SIC CODES (4-digit in order of priority)

A. FIRST: 2851 (specify)

B. SECOND: (specify)

C. THIRD: (specify)

D. FOURTH: (specify)

VIII. TYPE OF HAZARDOUS WASTE ACTIVITY

- [X] A. GENERATION
- [ ] B. TREAT
- [ ] C. STORE
- [ ] D. DISPOSE
- [ ] E. TRANSPORTATION (COMPLETE ITEM IX)
- [ ] F. PERMIT BY RULE
- [ ] G. REUSE, RECYCLE, RECLAIM
- [ ] H. OTHER (specify):

IX. MODE OF TRANSPORTATION (transporters only)

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

X. EXISTING ENVIRONMENTAL PROGRAM PERMITS

A. NPDES (Discharges to Surface Water): PAD 0 0 4 3 9 7 6 3 0

B. UIC (Underground Injection of Fluids):

C. RCRA (Hazardous Wastes):

D. PSD (Air Emissions from Proposed Sources):

E. SOLID WASTE:

F. OTHER: (specify)

XI. TYPE OF NOTIFICATION

Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a chan general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTI TIONS).

- [ ] A. FIRST NOTIFICATION
- [X] B. CHANGE OF GENERAL INFORMATION
- [ ] C. DELETION OF A WASTE
- [ ] D. ADDITION OF A WASTE
- [ ] E. DELETION OF AN ACTIVITY
- [ ] F. ADDITION OF AN ACTIVITY

CONTINUE ON REVERSE

ORIGINAL (Red)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 665-2900 (answers 24 hrs.)

March 14, 1986

NOTICE OF VIOLATION

CERTIFIED MAIL #P 580 728 573

Watson Standard, Inc.
P.O. Box 11250
Pittsburgh, PA 15232

Attention: Kearan Moore

RE: Hazardous Waste Accumulation, Labeling
Watson Standard Plant
Hite Road, Harwick, Pa.
Allegheny County

Dear Mr. Moore:

My inspection of January 30, 1986 revealed violations of the Pennsylvania Solid Waste Management Act, Act 1980-97, 35 P.S. Section 6018.101 et seq., (hereinafter "SWMA"). Specifically, 55 gallon drums of waste solvent (F003) were not marked with a date that accumulation of waste commenced as required by Section 75.262(g)(4) of SWMA. Also, the stickers that had been used to label these drums were badly weathered. Section 403(b)(2) of SWMA states: "It shall be unlawful for any person or municipality who generates, transports, stores, treats or disposes of hazardous waste to fail to label any containers used for storage, transportation or disposal of such hazardous waste as to identify accurately such waste." Section 75.262(g)(1) states: "A generator (of hazardous waste) may accumulate hazardous waste on-site without a permit for 90 days or less, provided that: all such waste is shipped off site or treated or disposed of on site within 90 days or less."

Another deficiency was your lack of an up-to-date authorization from the treatment or disposal facility that handles your hazardous waste. Section 262(d) says: "A generator, before designating a hazardous waste shipment for off-site treatment, storage, or disposal within the Commonwealth, shall contact the hazardous waste management facility and obtain a copy of a written authorization from the hazardous waste management facility." Such an authorization

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 665-2900 (answers 24 hrs.)

ORIGINA
(Red)

March 20, 1986

Watson Standard
P. O. Box 11250
Pittsburgh, PA 15238

Attention: Mr. Kearan Moore

RE: Water and Soil Contamination
Watson Standard, Inc.
Harwick Plant
Allegheny County
PAD004397030

Dear Mr. Moore:

The water samples I took from the site of your recent tank excavation on January 30, 1986 showed contamination by synthetic organic chemicals, specifically Trimethyl-cyclohexenone, Trimethyl-pentanediol, Xylene, Trimethyl-benzene isomers, and Napthalene. You should define the vertical and areal extent of these chemicals as a first step in the mitigation of this situation.

The Department would like to see a list of the chemical compounds that have been stored in the tank(s) excavated from that site as well as your proposal for remedial action at this site. We appreciate your cooperation in this matter.

Sincerely,

RKW

Randall K. Walton
Solid Waste Specialist
Southwestern Region

RKW:bc

cc: Inspector's File
Regional
Central (2)
Chron

CKECKLIST FOR SWMU RESPONSES

ORIGINAL (Red)

Name of Facility WATSON
EPA I.D # NMD 004397
Date Recieved 5/27/86

1. Is facility currently storing less than 90 days. YES ✓

2. Did facility claim that they filed in error YES ✓ N

3. Description/Number of SWMU's 0
   Land Disposal ____ Incinerators ____ Tanks ____
   Land Treatment ____ Surface Impoundments ____ Drums ____
   Other ____

4. Is there evidence of contamination YES ____ NO ____
   Groundwater: YES ____ NO ____
   Surface Water: YES ____ NO ____
   Air: YES ____ NO ____

5. Certification YES ____ NO ✓

6. PRIORITY

HIGH----Reported evidence of release to air, ground or surface wate

MEDIUM--No releases reported but land based SWMUs reported.

X LOW-----Everything else.

7. Comments: Incorrect Agency

Hazardous Waste Inspection Report
Generators – Part A

ORIGINAL (Red)

Date of inspection 2-9-88 Time start 9:30 Time finish 11:00

Name of inspector ROBERT FINKEL, SCOTT SWARM

Company, installation name WATSON STANDARD INC

Location [illegible]

County ALLEGHENY Municipality [illegible]

Identification number PAD004347030

Name of responsible official KEARAN MOORE

Title OPERATIONS MANAGER

Mailing address P.O. BOX 11250 PITTSBURGH PA 15238

Area code and telephone number (412) 362-8300

Name of person interviewed KEARAN MOORE JOHN KONESKY

Title OP. MANAGER

Mailing address *(if different from above)*

Area code and telephone number

1. Current waste handling method:

a.	☐ On-site	☐ treatment,	☐ storage,	☐ disposal	☐ PBR
b.	☒ On-site	☐ use,	☒ reuse,	☐ recycle,	☒ reclaim
c.	☐ Off-site	☐ treatment,	☐ storage,	☐ disposal	
d.	☒ Off-site	☒ use,	☐ reuse,	☐ recycle,	☐ reclaim

2. Amount of hazardous waste produced:

a. ≈30 @ 55 GALS kg./mo.

b. kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

F003 PAINT CLEANING WASTE
XYLENE, MIK

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

C+M

(Red)

Hazardous Waste Inspection Report
Generators – Part B

1—Non-Compliance, 2—Compliance, 3—Not Applicable, 4—Not Determined

Compliance Status				REQUIREMENT	Cha Cita
1	2	3	4		75.2
	X			Identification number	(c)(1)
				Hazardous waste shipments offered only to licensed transporters	(c)(4)
				Authorization received from TSD facility for wastes shipped off-site	(d)
	X			PA manifest used for intrastate shipments	(e)(2)
	X			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
	X			Manifests filled out properly and completely	(e)(7)
				Manifests routed properly and within time limits (7 days)	(e)(14) or
	X			Proper U.S. DOT shipping containers or packages	(f)(1)(i)
	X			Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
	X			Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
	X			Placards offered to transporter	(f)(2)
	X			Wastes accumulated on-site for less than 90 days	(g)(1)(i)
X				Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
	X			Containers managed in accordance with 75.265(q)(1)–(9)	(g)(1)(iii)
X				Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
	X			Records retained at designated location for 20 years	(h)
	X			Quarterly reports submitted to the Department	(i)
		X		Exception reporting procedures followed	(j)
		X		Hazardous waste disposal plan, if required	(l)
		X		Spill reporting procedures followed	(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
		X		Special requirements followed for international shipments	(o)
				On the job or classroom personnel training program [75.265(f)]	(g)(1)(ii)(v)
X				Drum accumulation area inspected & inspection logged weekly as per 75.265(q)(5)	(g)(1)(iii)

ORIGIN (Red)

Hazardous Waste Inspection Report
Comments – Part C

Date of Inspection 2-9-88 Identification Number PAD004397030

Company, Installation Name WATSON STANDARD

County ALLEGHENY Municipality SPRINGDALE TWP

√ LIDS NOT ON TWO ACCUMULATION DRUMS. DRUMS MUST BE CO

/ DRUMS NOT DATED OR LABELED UNTIL FULL - DRUMS MUST BE WITH THE DATE ON WHICH WASTE WAS FIRST PLACED IN THEM.

* DRUMS ARE STORED ON BARE GROUND WITH NO CONTAINMENT. DRU MUST BE STORED ON AN IMPERVIOUS SURFACE WITH ADEQUATE CONTA

√ NO WRITTEN WEEKLY INSPECTION RECORD OF DRUM ACCUMULATION AR A WRITTEN RECORD MUST BE KEPT.

/ WRITTEN LETTER OF APPROVAL FROM KEYSTONE OR OTHER CEMEN KILNS?

/ EMPLOYEES TRAINED IN WASTE HANDLING, AT LEAST YEARLY. WRITT RECORDS OF TRAINING?

/ PPC PLAN NEEDS TO BE UPDATED AND SUBMITTED TO THE DEPARTMENT FOR APPROVAL.

ALL HAZARDOUS WASTE NOW GOES TO BE BURNED IN KILNS.

A SOLVENT RECOVERY (DISTILLATION) UNIT IS USED, 55 GAL. BATCH.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____

Inspector (signature) Robert J. Fuksel Date 2/9/88

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 645-7100 (answers 24 hrs.)

February 16, 1988

NOTICE OF VIOLATION

CERTIFIED MAIL #P 536 373 461

Watson Standard, Inc.
P. O. Box 11250
Pittsburgh, PA 15238

Attention: Mr. Kearan Moore
Operations Manager

RE: Hazardous Waste Generator Inspection
Watson Standard
Springdale Township
Allegheny County
PAD004397030

Dear Mr. Moore:

An inspection of your facility was conducted on February 9, 1988 pursuant to the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. Section 6018.101 et seq., and the Rules and Regulations promulgated thereunder. The requirements of this Act are being enforced by the Pennsylvania Department of Environmental Resources which has received final authorization over hazardous waste activities by the U. S. Environmental Protection Agency.

Your facility has filed as a generator of hazardous waste and was inspected as such. As a result of this inspection, the Department observed the following violations of the minimum standards for a hazardous waste facility as set forth in 25 Pa. Code, Section 75.262.

Generator Violations

1. Accumulation date: 75.262(g)(1)(iv).

Containers shall be dated at the time that waste was first placed in them. By your admission your practice is to date containers only when they are full.

ORIGINAL
(Red)

To abate this violation, please obtain the required authorization letter and submit a copy to the Department within 15 days of receipt of this Notice.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based, nor shall this letter be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions, please feel free to call this office at 645-7100.

Sincerely,

Robert J. Finkel

Robert John Finkel
Solid Waste Specialist
Bureau of Waste Management
Southwestern Region

RJF/ld

Enclosure - PPC Plan Preparation Guidelines

cc: Regional
Chron
Central (2)
Kathy Watson
Scott Swarm
John Pastelock
Robert Finkel (2)

Bureau of Waste Management

ORIGIN (Red)

Hazardous Waste Inspection Report
Generators – Part A

Date of inspection JANUARY 9, 1989 Time start 8:30 Time finish 10:30

Name of inspector ROBERT FINKEL

Company, installation name WATSON STANDARD INC.

Location 616 HITE ROAD

County ALLEGHENY Municipality (HARWICK) SPRINGDALE TWP

Identification number PAD004397030

Name of responsible official KEARAN MOORE

Title OPERATIONS MANAGER

Mailing address P.O. BOX 11250 PGH PA 15238

...ea code and telephone number (412) 362-8300

Name of person interviewed KEARAN MOORE

Title

Mailing address *(if different from above)*

Area code and telephone number

1. Current waste handling method:

a.	☐ On-site	☐ treatment,	☐ storage,	☐ disposal	☐ PBR	
b.	☐ On-site	☐ use,	☐ reuse,	☐ recycle,	☐ reclaim	
c.	☒ Off-site	☐ treatment,	☐ storage,	☒ disposal	INCINERATION	
d.	☐ Off-site	☐ use,	☐ reuse,	☐ recycle,	☐ reclaim	

2. Amount of hazardous waste produced:

a. F003 ~~30~~ ±10,000 lbs ~~kg~~/mo.

b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

F003

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

F003 - ~~INCINERATED AT~~ TO SYSTECH, PAULING, OH
FUEL BLENDING
TO EVENTUAL INCINERATION

Hazardous Waste Inspection Report
Generators – Part B

ORIGINAL (Red)

1—No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compliance

Status 1	2	3	4	REQUIREMENT	Cha Cita 75..
X				Hazardous waste determination, copies available	(b)
X				Identification number	(c)(1)
		X		Hazardous waste shipments offered only to licensed transporters	(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site	(d)
	X			PA manifest used for intrastate shipments	(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
			X	Manifests filled out properly and completely	(e)(7)
X				Manifests routed properly and within time limits (7 days)	(e)(14) or (
X				Proper U.S. DOT shipping containers or packages	(f)(1)(i)
X				Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
X				Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
X				Placards offered to transporter	(f)(2)
X				Wastes accumulated on-site for less than 90 days	(g)(1)(i)
X				Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
			X	Containers managed in accordance with 75.265(q)(1)–[redacted](14)	(g)(1)(iii)
X				Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
				Records retained at designated location for 20 years	(h)
X				Quarterly reports submitted to the Department	(i)
		X		Exception reporting procedures followed	(j)
	X			Hazardous waste disposal plan, if required	(l)
X				Spill reporting procedures followed	(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
	X			Special requirements followed for international shipments	(o)
X				On the job or classroom personnel training program [75.265(f)]	(g)(1)[redacted](v)
				Drum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)

Hazardous Waste Inspection Report
Comments – Part C

ORIGINAL (Red)

Date of Inspection JANUARY 9, 1989 Identification Number PAD004397030

Company, Installation Name WATSON STANDARD INC.

County ALLEGHENY Municipality SPRINGDALE TWP

- SEVERAL MANIFESTS INCOMPLETE
  1) NO TRANSPORTER PA LICENSE ON SERVERAL
  2) NO HAZARD CODE AND PHYSICAL STATE ON SEVERAL

485268
- ONEMANIFEST, NO SIGNED COPY AVAILABLE PAB~~012694~~2
DATED 11/22/88

- ONE MANIFEST, SIGNED BY TSD, BUT NOT DATED PAB012694

- MANIFEST DISCREPANCIES
  PAB4852665 37 DRUMS SHIPPED ON LINE a. FLAMMAB.
  44 RECEIVED.
  IMPROPER CODES USED DR SHOULD HAVE BEEN DM.
  GAL — 11 — G.

GALLON DISCREPANCIES

ON MANIFEST	5300	RECEIVED 3222	PAB485266
	5000	4587	PAB469238
	4000	4596	PAB485267

- NO CONTAINMENT FOR DRUM STORAGE AREA
- MATERIAL THAT IS BEING FILTERED, DECANTED IS A HAZ. WASTE
- NO LONGER USING STILL.

– *This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.*

Person Interviewed (signature) [signature] Date

Inspector (signature) Robert J. Imbt Date 9 JAN 89

ORIGINAL
(Red)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 645-7100 (answers 24 hrs.)

January 13, 1989

NOTICE OF VIOLATION

CERTIFIED MAIL #P 979 042 297

Watson-Standard, Inc.
P.O. Box 11250
Pittsburgh, PA 15238

Attention: Mr. Kearan Moore
Operations Manager

RE: RCRA Facility Inspection - Generator
Watson-Standard, Inc.
Springdale Township
Allegheny County
PAD004397030

Dear Mr. Moore:

An inspection of your facility was conducted on January 9, 1989 pursuant to the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. §6018.101 et seq., and the Rules and Regulations promulgated thereunder.

Watson-Standard, Inc. has notified as a generator of hazardous waste and was inspected as such. As a result of this inspection the Department observed the following violations of the minimum standards for a hazardous waste facility as set forth in 25 Pa. Code §75.262.

Generator violations:

1. Container Management: Section 75.262(g)(1)(iii) and Section 75.265(q)(10-14). Container storage areas shall have a containment system capable of collecting and holding spills, leaks, and precipitation.

Facility Name/ID #	Date	Violation	Status
Breslube - Penn, Inc. PAD 98 069 0796	11/22/85	Failed to remove sludge and contaminated soil from lagoon areas and failed to perform a hazardous waste determination on 44 drums.	Non-compliance. Re-inspected 6/26/86.
H. H. Robertson Company PAD 00 432 8076	4/10/86	Failed to label drums and did not have a PPC Plan.	PPC due 7/31/86. HHR submitted letter advising they cor violation. Reinspection scheduled 8/8
Gibbs Corporation PAD 00 433 7556	4/2/86	Storage greater than 90 days. Open drums, inadequate drum management and out-of-date operating record.	6/16/86 inspection revealed drums remo disposed. Further clean-up of process ment needed and NOV will be sent. Plant closed.
S & S Chrome Plating PAD 04 586 7470	4/2/86	No records on site, no PPC Plan, lacked waste analysis of 5 drums. No weekly inspection of storage/treatment areas.	5/29/86 inspection revealed compliance SQG
ARCO Marketing Terminal PAD 04 720 2890	3/24/86	Inadequate PPC Plan.	PPC Plan needs minor revisions and compa doing.
Watson Standard PAD 00 439 7030	3/14/86/ 3/20/86	Soil contamination. Failed to label drums.	4/86 inspection - drums labelled. Environmental Assessment under review.
Neville Chemical Co. PAD 00 433 4157	11/27/85	No hazardous waste determination on: 60-80 drums; recovered groundwater; liquid resins. No PPC Plan.	Hazardous was determination made on drums resin, and groundwater. PPC Plan submitt
	2/14/86	Treatment without notification.	
	4/2/86	Failure to submit spill report; no waste determination of spilled material.	
Calig Drum Company PAD 00 432 7656	3/3/86	No PPC Plan. Failure to label and mark drums. Leaking drum and no weekly inspections.	Company informed DER that violations corr Reinspection scheduled for 8/86. Getting quotes on PPC from consultants.
Teledyne Columbia-Summerhill PAD 04 374 6841	1/17/86	Storage greater than [illegible] s. Drums not labelled properly. Im[illegible] r drum storage. Lacked inspection logs, [illegible]sonnel training.	6/11/86 inspection - compliance.
U.S. Steel Chemical PAD 00 082 4730	10/3/85	No weekly inspection of [illegible]tainer storage area.	10/15/85 reply from company that inspecti program established.
U.S. Steel - Clairton Works	9/25/85	Spillage of [illegible]	

ORIGINAL (Red)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 665-2900 (answers 24 hrs.)

ORIGINAL (Red)

July 21, 1986

Watson-Standard Company
P.O. Box 11250
Pittsburgh, PA 15238

Attention: Mr. Kearan A. Moore, Jr.
Coordinator of Regulatory Affairs

RE: Subsurface Contaminant Report
Watson-Standard Company
Harwick Works
Allegheny County

Dear Mr. Moore:

The Department has received the subsurface contamination survey dated June 16, 1986. The results of the survey indicate: 1) xylene contamination levels are less than 5 ppm, 2) the contamination is localized, and 3) the contamination does not appear to have affected the groundwater in the area. As such, the Department contends that the contamination is minimal and does not warrant removal of the contaminated soils.

As no soil removal is necessary, you may fill the excavated holes and grade as you had planned.

If you have any questions, please call this office at 665-2900.

Sincerely,

Kathryn L Watson

Kathryn L. Watson
Solid Waste Specialist
Bureau of Waste Management

KLW/kld

cc: Mr. Jim Lore - Harwick Works
Allegheny County
Chron
K. Watson (2)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT
Highland Building
121 South Highland Avenue
Pittsburgh, Pennsylvania 15206-3988
(412) 665-2900 (answers 24 hrs.)

ORIGINAL (Red)

March 20, 1986

Watson Standard
P. O. Box 11250
Pittsburgh, PA 15238

Attention: Mr. Kearan Moore

RE: Water and Soil Contamination
Watson Standard, Inc.
Harwick Plant
Allegheny County
PAD004397030

Dear Mr. Moore:

The water samples I took from the site of your recent tank excavation on January 30, 1986 showed contamination by synthetic organic chemicals, specifically Trimethyl-cyclohexenone, Trimethyl-pentanediol, Xylene, Trimethyl-benzene isomers, and Napthalene. You should define the vertical and areal extent of these chemicals as a first step in the mitigation of this situation.

The Department would like to see a list of the chemical compounds that have been stored in the tank(s) excavated from that site as well as your proposal for remedial action at this site. We appreciate your cooperation in this matter.

Sincerely,

Randall K. Walton

Randall K. Walton
Solid Waste Specialist
Southwestern Region

RKW:bc

cc: Inspector's File
Regional
Central (2)
Chron

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF LABORATORIES
SPECIAL ANALYSES REPORT

Lab Number 02a-4

Date Received 1/31/86

DER-EP

ESTABLISHMENT	CASE	FACILITY	COLL NUM
Watson Standard Inc		Tank storage Excavation	25

COUNTY	MUNICIPALITY	PROGRAM	COLL NAME/PHONE NUMBER	TYP STRT	SUD ANALYS
Allegheny	Harwick	SW	R. Walton 652-2013		

SOUTHWESTERN REGION

CARD (1 or 2)	ID CODE (ALL CARDS) 4–16						LATITUDE 4–10	LONGITUDE 11–18	DATE 19–24			TIME 25–28	
	Cnty	Mun	T	Est	Case	Fac.			M	D	Y	Hr	Min
1								0	01	31	86		

USGS Q 30 34	BUREAU 35–37 AMIS	SAMPLE NUMBER 38–43	STREAM NAME 44–57	RELATIVE PO
	SWM	25123838		

FULL DESCRIPTION WHERE SAMPLE TAKEN: excavation of solvent tank (water in pit)

ADDITIONAL LAB ANAL: mineral spirit, MIBK, isophoro, VM&P NAPTHA, xy

CUSTODY LOG
Shipped Purolator Date 1/30/86
Legal Seal No.
Received by:
Seal Condition:

F003

QUALITATIVE REPORT

DO NOT WRITE BELOW THIS LINE

GC/MS also detected trimethyl-cyclohexenone and Trimethyl pentanediol estimated to total beteen 200 and 20 mg/l. also various unknowns

QUANTITATIVE RESULTS

ANALYSIS:	UNITS:	ANALYSIS CODE	RESULTS (SHOW DECIMAL POINTS ON LINES)
lene	mg/l	est.	8.0
imethyl Benzene Isomers		est.	6.0
Naphthalene			1.0

ANALYST SIGNATURE

DATE 2/19/86

ml. extracted 1/31/86 mtp

...MENT OF ENVIRONMENTAL RESOURCES
BUREAU OF LABORATORIES
SPECIAL ANALYSES REPORT

ORIGINAL (Red) Date Received 5/13/

ESTABLISHMENT	CASE	FACILITY	COLL NUM
Watson Std		drain pipe	25

COUNTY	MUNICIPALITY	PROGRAM	COLL NAME/PHONE NUMBER	TYPE TR	STD ANALY
Allegheny	Harwick	BWM	R. Watton 665 2900		

CARD (S)	ID CODE (ALL CARDS) 4–16						LATITUDE 4–10	LONGITUDE 11–18	DATE 19–24			TIME 25–28	
1/2	Cnty	Mun	T	Est	Case	Fac.		0	M: 05	D: 08	Y: 86	Hr: 05	Min: 10

USGS Q 30 34	BUREAU 35–37 AMIS	SAMPLE NUMBER 38–43	STREAM NAME 44–57	RELATIVE PI
		251236 0		

FULL DESCRIPTION WHERE SAMPLE TAKEN: Soil under overflow pipe for water tank. Is it diesel or are solvents getting into system?

ADDITIONAL LAB ANA: UV-IR

CUSTODY LOG
How Shipped: Purolator Date: 5/9/86
Legal Seal No.:
Received by:
Legal Seal Condition:

QUALITATIVE REPORT

DO NOT WRITE BELOW THIS LINE

UV-IR – similar to a mineral oil but has other material – possibly a plasticizer or a resin.
– not similar to diesel fuel.

QUANTITATIVE RESULTS

ANALYSIS:	UNITS:	ANALYSIS CODE	RESULTS (SHOW DECIMAL POINTS ON LINE)

ANALYST: Michael DeFilippo (SIGNATURE) DATE: 5/14/86

APPENDIX B

ORIGINAL
(Red)

REMEDIAL CORPORATION

REPORT
SUBSURFACE CONTAMINATION SURVEY
HARWICK WORKS
HARWICK, PENNSYLVANIA

PREPARED FOR

WATSON-STANDARD CO.
TECHNICAL COATINGS DIVISION
PITTSBURGH, PENNSYLVANIA

JUNE 16, 1986

PROJECT NO. 86222

REMEDIAL CORPORATION
PITTSBURGH, PENNSYLVANIA

ORIGINAL (Red)

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ORIGINAL (Red)

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REMEDIAL CORPORA

1.0 INTRODUCTION

This report provides an account of the investigation of subsurface contamination in an area formerly used for the underground tank storage of solvents at the Watson-Standard Co. (Watson-Standard) Harwick Works, Harwick, Pennsylvania. The scope of the study consisted of sampling and analysis of the soils within and around the former locations of seven underground storage tanks and evaluation of the conditions encountered. This work was performed and this report prepared by Remedial Corporation (Remcor) under contract to Watson-Standard.

1.1 BACKGROUND

The Watson-Standard Harwick Works formulates and manufactures paints and other technical coatings. Nonhalogenated aromatic solvents are used in product formulation. As was common industrial practice, feedstock solvents were stored in underground tanks. Seven storage tanks were installed in 1965 or 1966 west of the main plant building, each of which was 8 feet in diameter and 16 feet long, with a nominal capacity of 6,000 gallons. The tanks were buried with an invert depth of approximately 12 feet. Information made available from Watson-Standard indicates that these tanks contained the following since their installation:

- Xylene
- Mineral spirits
- Isophorone
- Methyl isobutyl ketone
- Naphtha
- Solvesso 100 (aromatic hydrocarbons)
- Solvesso 150 (aromatic hydrocarbons).

In late 1985, Watson-Standard contracted with the Western Pennsylvania Construction Company to remove and dispose the underground tanks after construction of new above-ground facilities. Watson-Standard plans to use the former tank burial area for a paved parking lot.

While the final tank was being excavated, an inspector from the Pe sylvania Department of Environmental Resources (DER) arrived on sit perform an annual inspection of the Resource Conservation and Recov Act (RCRA) generator storage area located near the former undergrou tank location (Figure 1). At the time of this inspection, the DER representative noted the presence of liquids in the trench being ba filled; with permission of Watson-Standard, he obtained a sample of water for analysis and submitted it to the DER laboratory for analys Upon testing, the sample was found to contain the following:

- Xylene - 8 milligrams per liter (mg/l)
- Trimethylbenzene isomers - 6 mg/l
- Napthalene - 1 mg/l.

The gas chromatography/mass spectrometry (GC/MS) analysis also detect trimethyl-cyclohexenone and trimethylpentanediol estimated to total b tween 20 and 200 mg/l. Watson-Standard does not believe that trimeth cyclohexenone or trimethylpentanediol were ever stored in these tanks.

Watson-Standard personnel recalled that the trenches were dry as the tanks were being excavated, but that rain had delayed excavation activ ties for several days. They believe the liquids present in the excava tion may have resulted from rainwater runoff. Also, during excavation of the tanks, puncturing of a tank could have occurred. Watson-Standa did, however, pump the tanks dry of recoverable solvents prior to exca- vation.

DER forwarded to Watson-Standard a letter dated March 20, 1986, re- questing that Watson-Standard define the vertical and areal extent of contamination and requested proposals for remedial action as needed at the site.

1.2 PURPOSE AND OBJECTIVES OF STUDY

The purpose of this study is to respond to the DER letter of March 20, 1986 by providing a definition of the vertical and areal extent of contamination associated with the former underground tank storage of solvents and the assessment of its significance. The scope of activities was developed through discussions with DER and Watson-Standard representatives. A summary of the proposed program was presented to DER prior to the start of work.

1.3 STUDY METHODOLOGY

To accomplish the stated objectives of this work, Remcor designed and implemented a work plan consisting of three tasks as follows:

- Field drilling sampling and surveying
- Sample analysis
- Evaluation of site conditions.

The following sections describe the techniques employed in the field and laboratory analysis programs.

1.3.1 Field Investigation

The field investigation was primarily conducted on May 8, 1986. Eight shallow test borings were drilled within and adjacent to the previous underground storage tank area. The borings were drilled using a truck-mounted drill rig and hollow-stem augers. The Remcor field geologist compiled a boring log for each hole (Appendix A). Split-spoon soil samples were collected in accordance with the American Society for Testing and Materials (ASTM) Method 1586-74 in seven of the borings (TB-1 through TB-7). All samples were placed in either specially cleaned laboratory glass sample jars (samples for analytical purposes) or in standard geotechnical jars. Samples selected for subsequent analytical testing were composited from the desired interval. Chain-of-custody procedures were adhered to throughout the sample handling and analysis.

Through use of an organic vapor analyzer (OVA), total organic vapor concentrations were recorded in the headspace of all jarred samples. OVA readings versus time were also recorded in Boring TB-8 to provide an estimate of soil contamination levels. Scanning of the collected soil samples with the OVA was routinely conducted.

Six representative soil samples of material beneath, within, and adjacent the previous underground storage tank area were selected for analysis for purgeable aromatics to quantify soil contamination levels. Additionally, a water sample was taken from one of the borings and analyzed for benzene, toluene, and xylene.

Split-spoon samplers were decontaminated after each use by the following procedures:

- A water wash
- A hexane rinse
- A distilled water rinse.

Upon completion of field activities, the boreholes were plugged with a layer of bentonite followed by a mixture of bentonite and cuttings. All borings were staked at the time of backfilling. All borings were surveyed to provide suitable ground control.

1.3.2 Laboratory Analysis

Samples delivered to the laboratory were analyzed according to the U.S. Environmental Protection Agency (EPA) approved procedures and the laboratory's quality control standards. Laboratory analysis consisted of a GC screen for purgeable aromatics (benzene, toluene, and xylene) using EPA Method 8020 (SW-846).

2.0 SITE DESCRIPTION

The excavated tank area is located west of the main plant building adjacent the pump room (Figure 1). Four of the tanks were located west of the pump room and three were located north of the pump room, creating an L-shape configuration. The plant area is bounded on the south by a railroad track easement. A wooded slope of approximately ten feet in relief occurs between the southern property line of the plant and the topographically lower railroad tracks. This slope drains runoff from the southwest portion of the property.

To the west of the area is a newly constructed tank farm that replaced the underground tanks. Pennsylvania State Route 28 lies west of the tank farm. To the north of the area is a parking lot and storage area. East of the excavated area is the Watson-Standard plant.

Topographically, the area west of the plant is flat-lying. Much of the area is covered with asphalt and cinders. The excavated tank area is mildly undulating and contains numerous ruts from vehicle traffic. No dominant slope exists in the excavated tank area and surface water drainage is poor. The material used for backfill of the tank area is not well compacted and easily compresses from heavy loads.

2.1 SITE SOILS

The area of the site is characterized by a layer of fill materials underlain by a natural deposit of brown to gray mottled silty clay. Five of the borings (TB-1 through TB-5) were drilled within the excavated underground storage tank area. Encountered depths to the silty clay ranged from 11.8 to 12.5 feet in these borings. Borings TB-6 and TB-7 were drilled outside the area of tank excavation and encountered the silty clay material overlain by fill at depths of 4.0 and 6.0 feet, respectively. Boring TB-8 terminated at a depth of 4.0 feet in the overlying fill. It is located at the edge of the excavated tank areas.

2.1.1 Fill Materials

Three distinct types of fill exist within the area of investigation. Occurring at ground surface is a brown silty fill with angular siltstone fragments ranging from gravel to cobble size. The consistency of this material is soft to very soft with blow counts typically in the range of three to five per foot. Thickness is variable and ranges from approximately 1.0 foot to 12.5 feet. Within the excavated tank areas, thickness ranges from an approximate 3.0-foot depth at TB-4 to 12.5 feet at TB-3.

A second fill material is present below the surficial material at TB-2 and TB-4 and is composed of green-gray silt with an occasional trace of sand. Consistency of this material is soft to very soft. Thickness ranges from 5.0 feet at TB-2 to 9.0 feet at TB-4. At TB-4, the material exhibits a sludge-like nature.

The third type of fill is a black sludge-like material which varies in thickness from 5.5 feet at TB-7 to 8.0 feet at TB-5, the only two borings in which it was encountered. At TB-7, the material is mixed with rock fragments and brick chips that create a granular matrix. The depth of the material is from 5.0 to 13.0 feet at TB-5 and from 0.5 foot to 6.0 feet at TB-7. Consistency is soft to very soft with blow counts ranging from two to seven per foot. Watson-Standard personnel observing the drilling suggested that the black sludge may have resulted from the former use of this area as a septic tank leach field.

2.1.2 Underlying Native Soils

The natural soil deposit below the fill is of an alluvial nature and is stiff brown to gray mottled silty clay with an occasional trace of sand. Beneath the excavated tank areas, the deposit occurs at a depth between 11.8 to 12.5 feet below grade. Outside the tank areas, the deposit exists at between 4.0 and 6.0 feet below grade. Grain size of the deposit is relatively constant throughout the area. At TB-3, the silty clay

grades to a sandy silt with little clay from 15.0 to 18.0 feet (base of boring) and at TB-4, the deposit ranges from a clay to sandy clay. Borings TB-1 through TB-7 terminated within this deposit; TB-8 terminated in the fill overlying the silty clay.

Geotechnical borings previously drilled by others 50.0 feet west of the tank excavation area for the new above-ground storage tank system revealed a thickness of fill of 1.5 feet underlain by alluvial material ranging from a medium sand to a sandy silt to a depth of 20.0 feet below grade. This deposit is predominantly a silty very fine sand with a sandy silt layer occurring between 12 and 16 feet. The density of the coarser grained material ranges from loose to medium dense and consistency of the cohesive deposits ranges from stiff to very stiff.

2.2 GROUND WATER

Subsurface water was encountered within the fill material at Borings TB-2, TB-3, TB-5, and TB-7. Boring TB-8 was terminated above the saturated zone; TB-1 produced no standing water immediately after drilling and was backfilled shortly after completion. Borings TB-4 and TB-6 remained open after drilling for approximately 15 hours and were dry after that time.

All of the borings (with the exception of TB-1) were allowed to remain open overnight after drilling so that stabilized water levels could be obtained the following day. Water level elevations for the borings are given in Table 1. The elevations of this water zone show it to be erratic and discontinuous.

The existence of subsurface water in this area appears to be a localized condition resulting from the infiltration of surface water through the recently placed fill material in the excavated tank areas and perching atop the silty clay alluvium that is consistent throughout the area. No dominant slope exists over the excavated area and thus drainage is poor.

Ponded water has been observed on the tank excavated area days after precipitation events. This water slowly infiltrates the noncompacted fill into the subsurface. Evidence supporting this conclusion follows:

- There is no appreciable recharge area contributing ground water.
- It is unlikely that underground storage tanks would have been installed below a water table.
- Ground water was not reported at the time the tanks were excavated.
- Ground water was not encountered to a depth of 20 feet in the four geotechnical borings drilled for an above ground storage system located 50 feet west of the excavated tank areas.
- The lack of a ground water discharge point in the direction of surface slope, south of the tanks along the railroad tracks.

The silty clay deposit exhibits low permeability and is an effective confining layer that restricts or greatly retards vertical migration of subsurface water beneath the excavated tank areas. This causes the infiltrating water to perch at a shallow depth. Additionally, if this deposit is continuous laterally adjacent to the tank excavations, it would also retard lateral flow.

2.3 SUBSURFACE CONTAMINATION

The testing performed for this study indicates that small quantities of solvents are present in the excavated area. From past and present sampling and the known history of the tanks, xylene appears to be the major constituent of interest.

2.3.1 Laboratory Testing

Six soil samples and one ground water sample were analyzed for purgeable aromatics (i.e., benzene, toluene, and xylene). The laboratory was also

requested to identify other purgeable aromatics that were present in t samples. The soil samples sent for analysis consisted of the followin

- One sample from the backfill material of the excavated tank area.
- Three samples of the silty clay deposit beneath the excavated tank areas.
- Two samples of the silty clay deposit lateral to the tank excavations.

This combination of samples provides data on the concentration of solvents at the source of contamination and representative soils both horizontal and vertical to the source area. The ground water sample was taken from a boring within the excavated tank area. Results of the samples are summarized in Table 2.

The analyses reveal that some solvent contamination is present in the area of the excavated tanks but was not detected in soil samples beneath or adjacent to the excavation. A limited area has been affected. Analysis of fill from the excavated tank area shows xylene to be present at 3.9 parts per million (ppm) in soil and 4.5 ppm in subsurface water. Other contaminants present were benzene at 162 parts per billion (ppb) and tetrachloroethylene at 675 ppb in subsurface water. No contamination was detected in five soil samples from beneath and adjacent to the excavated tank areas.

To provide perspective to the analytical results, Remcor performed calculations of the quantities of solvents encountered. In these calculations, the following factors/assumptions were applied:

- The fill consists of approximately 670 cubic yards (1,000 tons) of soil.
- Pore fluids within the fill total 20,000 gallons.

- The soil contains 3.9 ppm xylene.
- The pore water contains 4.5 ppm xylene.

These calculations show the total quantity of xylene present in the subsurface under these conditions is approximately one gallon.

To supplement the analytical sampling, OVA headspace readings of jarred soil samples were recorded. The results are summarized in Tables 3 through 6 that segregate soil samples on the basis of fill, natural materials, and proximity to the excavated areas. Figure 2 is a cross-section through the investigated area depicting OVA headspace readings and analytical results to subsurface materials.

Organic vapors were detectable throughout the investigated area. The highest concentrations generally were found in the backfill material in the tank areas, and the lowest concentrations were found in natural soil adjacent to or beneath the excavated tanks. An exception is TB-7, a boring drilled outside the tank excavation area. A black sludge-like deposit was encountered from a 0.5- to 6.0-foot depth that is similar to the fill sampled from TB-5 that contained 3.9 mg/l xylene. The headspace reading from this material was 138 ppm, third highest of the samples. This higher reading could reflect the presence of other organic materials within the black sludge; this finding is consistent with the observation that the black sludge could have resulted from use of the area as a septic tank leach field. The headspace readings (when used in a relative sense) generally show organic contamination to decrease away from the source area.

To correlate headspace readings to an approximate soil concentration, a mass-balance analysis was applied relating the properties of the assumed contaminant (i.e., xylene) to the headspace reading and the volume of air and soil within the jar (Table 3). For soil sample with the highest

headspace reading (TB-3, 11.5 to 12.5 feet); results show that a headspace of 290 ppm equates to 156 ppb of xylene concentration in the soi if all of the soil contamination is assumed to have volatized. If it : assumed that only 10 percent of the xylene has volatized, the calculate soil contamination level becomes 1,560 ppb, or 1.56 ppm, approximately the concentration detected in ground water at TB-2 (4.4 ppm xylene) and the soil from 7.0 to 9.0 feet in TB-5 (3.9 ppm xylene).

The black sludge material present in a boring outside the excavated area (TB-7), however, was similar in appearance as the sample from TB-5 at 7.0 to 9.0 feet, in which xylene was present. The material in TB-7 exhibited a headspace reading of 138 ppm. Other OVA readings outside the fill area showed organic vapors to dissipate away from the source.

Another method of estimating the concentration of a particular contaminant is to record the OVA readings over time in a borehole and utilize a modified Shen (1980) formula relating the vapor pressure and diffusion coefficient of the contaminant to the contributing area over a given time interval.

This calculation was applied at Boring TB-8 that was drilled into the backfilled tank area, showing a total volatile organic concentration in soil of 220 ppm (as xylene). This value may reflect the presence of the organic compounds and is generally consistent with DER data that showed total priority and nonpriority volatile organics to be on the order of 200 mg/l in their collected water sample.

3.0 EVALUATION OF SITE CONDITIONS

Remcor has evaluated the subsurface conditions identified by our contamination survey. This evaluation addresses both the significance of the contamination found and the regulatory framework that establish appropriate responses.

3.1 ENVIRONMENTAL SIGNIFICANCE

The backfilled materials for the tank excavations have been identified as contaminated with low to moderate levels of purgeable aromatic hydrocarbons. The results of the contamination survey show that the contamination is generally limited to these materials and has not affected underlying native soils. Contaminated subsurface water appears to be a localized perched water that is not interconnected to regional ground water.

These observed conditions lead to the conclusion that the presence of subsurface contamination at the levels found does not pose a significant environmental threat.

3.2 REGULATORY ANALYSIS

Based on information provided by Watson-Standard, Remcor understands that the solvents stored in the underground tanks were primarily xylenes and related compounds. Spills of these commercial products would be considered hazardous under Pennsylvania Solid Waste Regulations (Title 25, Section 75.261) if the spill residues exhibit the characteristic of ignitibility. Waste xylene is not considered a "toxic" material under RCRA.

The levels of contamination found in soils and ground water indicate that the spill residues would not exhibit the characteristic of ignitibility and are not considered hazardous wastes [Title 25, Section

75.261(b)(4)(i)]. Furthermore, the results of the site investigation suggest no off-site releases to surface or ground waters.

3.3 NEED FOR REMEDIAL ACTION

Remcor's evaluation of the former underground tank area at the Watson-Standard Harwick Works indicates that remedial action is not required to address the current situation. Watson-Standard may choose to implement certain actions (e.g., foundation improvement) as part of their development of this portion of the plant site as a parking area.

ORIGINAL
(Red)

4.0 CLOSING

Remcor has completed the subsurface investigation at the Watson-Standard Harwick Works and trusts that this report satisfies your requirements. If you have any questions or need additional information, please do not hesitate to contact us.

Respectively submitted,

Joseph G. Kasper
Project Geologist

Leo M. Brausch
Vice President

JGK:LMB:rmv
Enclosures

REMCOR
REMEDIAL CORPORATION

TABLES

TABLE 1

SUBSURFACE WATER LEVELS

BORING NO.(1)	GROUND SURFACE ELEVATION(2) (ft-MSL)	WATER LEVEL ELEVATION (ft-MSL)	DEPTH TO WATER (ft)
TB-1	971.5	Backfilled	_(3)
TB-2	971.4	968.4	3.0
TB-3	971.1	968.4	2.7
TB-4	970.1	Dry	-
TB-5	970.5	961.9	8.6
TB-6	970.8	Dry	-
TB-7	970.5	969.5	1.0

(1) For boring locations, see Figure 1.

(2) Elevations based on Remcor field survey using plant floor elevation of 972.0 feet-mean sea level as datum.

(3) "_" indicates no data.

ORIGINAL (Red)

TABLE 2
ANALYTICAL DATA SUMMARY

SOIL SAMPLES

BORING NO.(1)	DEPTH INTERVAL(2) (ft)	CONCENTRATION IN ms/ks BENZENE	TOLUENE	XYLENE
TB-2	13.5 to 15.5	<0.02(3)	<0.02	<0.02
TB-4	12.0 to 15.0	<0.02	<0.02	<0.02
TB-5	7.0 to 9.0	<0.02	<0.02	3.9
TB-6	7.0 to 9.0	<0.02	<0.02	<0.02
TB-6	11.0 to 13.0	<0.02	<0.02	<0.02
TB-5	13.0 to 14.5	<0.02	<0.02	<0.02

WATER SAMPLE

BORING NO.(1)	CONCENTRATION IN µg/l BENZENE	TOLUENE	XYLENE	TETRACHLOROETHYLENE
TB-2 Ground Water at 3.0'	160	<0.01	4,500	680

(1) For boring locations, see Figure 1.
(2) For descriptions of materials, see boring logs (Appendix A).
(3) "<" indicates less than detection limit.

TABLE 3

OVA READINGS AND SCREENING LEVELS
OF VOLATILE ORGANICS IN SOILS

LOCATION	BORING NO.	DEPTH INTERVAL (ft)	PEAK OVA READINGS IN HEADSPACE (ppm)	CALCULATE VOLATILE ORGANIC CONCENTRATI IN SOIL[1] (ppb)
Fill Material within Excavated Tank Areas	TB-1	12.0 to 12.8	17	91
	TB-3	4.0 to 6.0	15	81
	TB-3	8.0 to 10.0	250	1,350
	TB-3	12.0 to 12.4	290	1,560
	TB-5	2.0 to 4.0	60[2]	-[3]
	TB-5	7.0 to 9.0	30	160
Fill Material Outside Excavated Tank Areas	TB-6	2.0 to 4.0	6[2]	-[3]
	TB-7	2.0 to 3.0	138	740
Natural Material Underlying Excavated Tank Areas	TB-1	12.8 to 13.5	4	22
	TB-1	13.5 to 15.5	2.5	13
	TB-2	11.75 to 13.5	29	160
	TB-2	13.5 to 15.5	80[2]	-[3]
	TB-3	12.4 to 14.0	59	320
	TB-3	16.0 to 28.0	78	420
	TB-4	12.0 to 15.0	0[2]	-
	TB-5	12.0 to 14.5	0.9	5

See footnotes at end of table.

TABLE 3
(Continued)

LOCATION	BORING NO.	DEPTH INTERVAL (ft)	PEAK OVA READINGS IN HEADSPACE (ppm)	CALCULA VOLATIL ORGANI CONCENTRA IN SOIL ((ppb)
Natural Material Outside Excavated Tank Areas	TB-6	7.0 to 9.0	3(2)	_(3)
	TB-6	11.0 to 13.0	4(2)	-
	TB-7	7.0 to 9.0	58	310
	TB-7	11.0 to 13.0	40	220

(1) Assumes 10 percent of organics volatized into headspace. Calculations based on xylene as contaminant of concern.

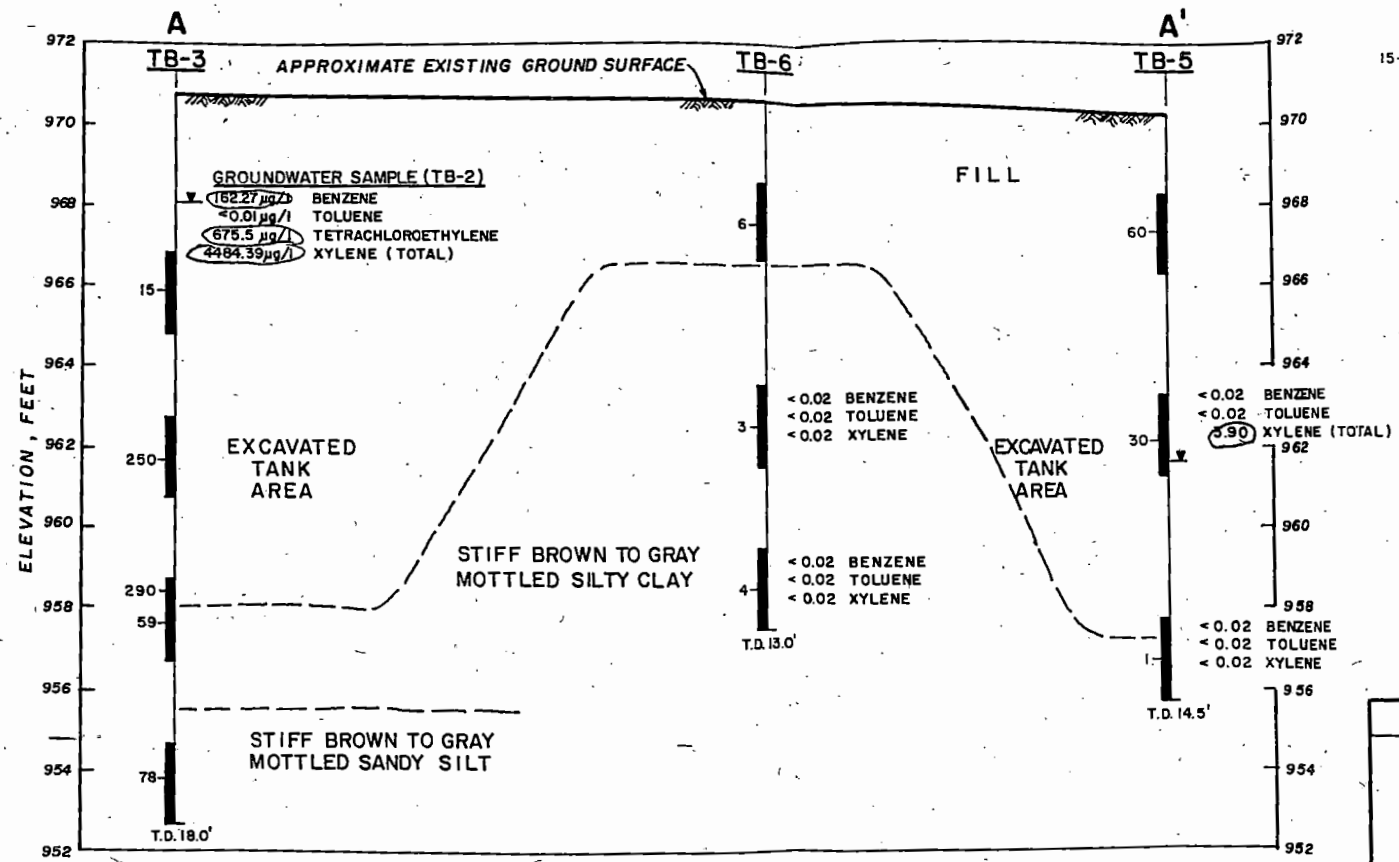
(2) Headspace taken of a full jar sample.

(3) "_" not calculated.

ORIGINAL
(Red)

FIGURES

ARMSTRONG
REMEDIAL CORPORATION



HORIZONTAL SCALE : 1"=6'
VERTICAL SCALE : 1"=3'

LEGEND

15 SAMPLED INTERVAL AND HEADSPACE OVA READING, PPM.

WATER LEVEL IN BOREHOLE

< 0.02 BENZENE
< 0.02 TOLUENE
< 0.02 XYLENE

ANALYTICAL RESULTS OF SAMPLED INTERVAL. VALUES ARE Mg/Kg UNLESS OTHERWISE NOTED.

NOTE

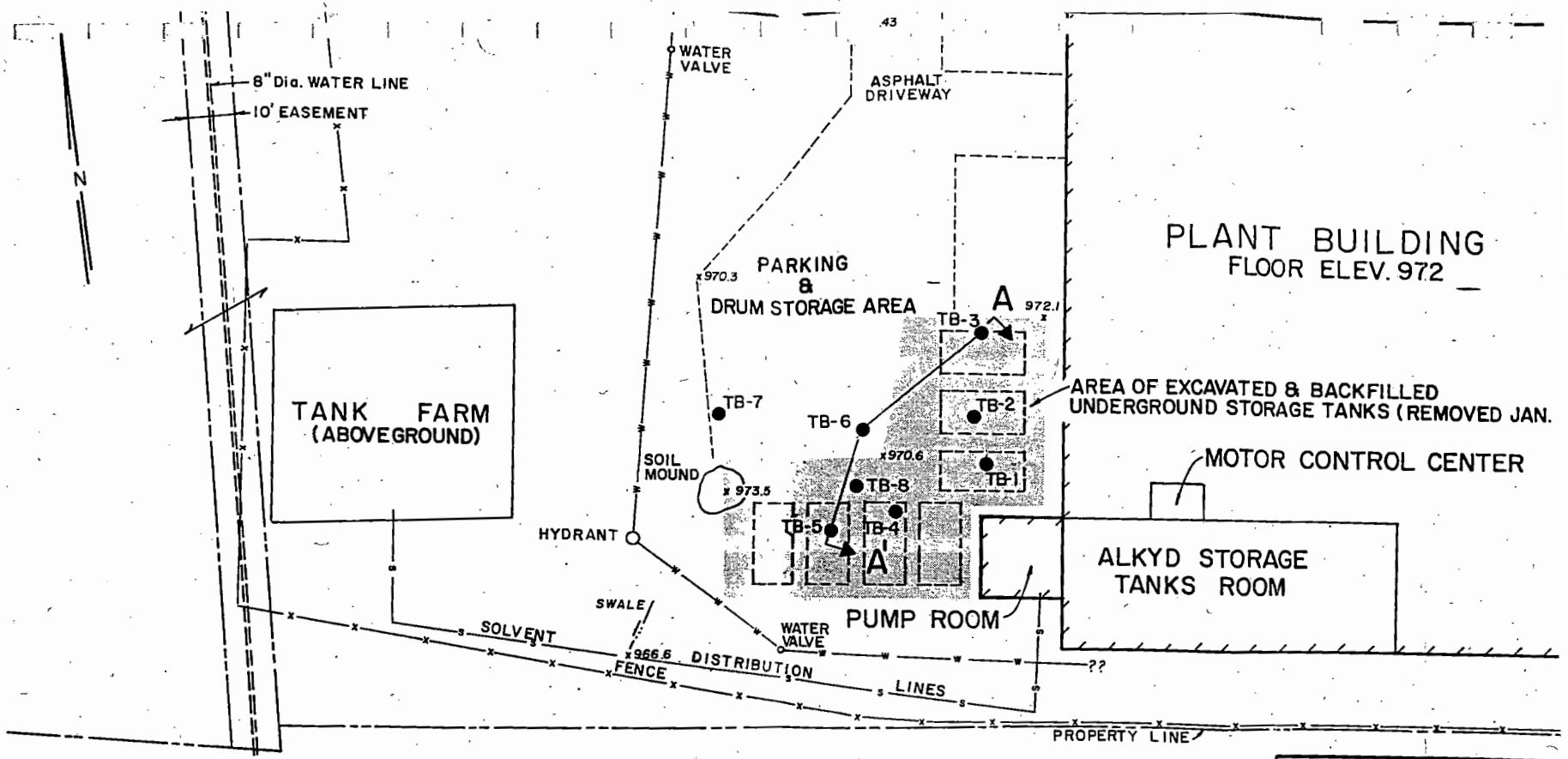
FOR PLAN LOCATION OF SECTION SEE FIGURE 1.

FIGURE 2

CROSS SECTION A-A'

PREPARED FOR
WATSON-STANDARD CO.
PITTSBURGH, PENNSYLVANIA

DRAWN



NOTES

1. VERTICAL DATUM IS PLANT FLOOR = 972 MSL.
2. HORIZONTAL AND VERTICAL CONTROL BY REMCOR SURVEY CONDUCTED 28 MAY 1986.
3. PROPERTY BOUNDARIES TAKEN FROM WATSON-STANDARD CO "SITE PLAN MAP".
4. FOR CROSS-SECTION A-A', SEE FIGURE 2.

SCALE — FEET
0 20 40 60

FIGURE 1

SITE INVESTIGATION PL

PREPARED FOR
WATSON-STANDARD CO.
PITTSBURGH, PENNSYLVA

DRAWN	13 MAY 86	DAG	DRAWING
CHECKED	JGK 6/6/86		8622
APPROVED	LMB 6/6/86		

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